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July 23, 2015

**BY ECF**

The Honorable Robert W. Sweet  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 18C  
New York, NY 10007-1312

**Re: *Contact Solutions, LLC v. Daniel O'Sullivan and Gyst, Inc., Civ. Action. No. 15-cv-04292***

Dear Judge Sweet:

I am counsel to Plaintiff Contact Solutions, LLC ("CS") in the above matter, arising from copyright infringement and misappropriation of trade secrets and confidential business information by a former senior employee of CS, Defendant O'Sullivan, and his unincorporated business identified as "Gyst, Inc." ("Gyst").

I write in furtherance of my July 1, 2015 request to serve the Summons and Complaint upon Michael S. Cox, Mr. O'Sullivan's counsel in a related matter, as agent for both Mr. O'Sullivan and Gyst, pursuant to Rule 4(e)(1) of the Federal Rules of Civil Procedure and New York Civil Practice Law and Rules § 308(5).

CS urgently needs to serve O'Sullivan and Gyst, so that it can seek a preliminary injunction preventing further copyright infringement and misappropriation during the pendency of this action. To date, O'Sullivan has cleverly avoided service by concealing his home address, including by affirmatively swearing to a false and misleading home address in a verified pleading in a related action. An order permitting CS to serve Mr. Cox's office would put an end to Mr. O'Sullivan's ruse, and enable CS to obtain a much needed adjudication of the matter on the merits.

Respectfully Submitted,



Matthew J. Press

Cc: Michael Cox  
Michael Southworth  
Vete Clements  
Jake McDermott